UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD)(SN) ECF Case

This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN) (and member case Marie Laure Anaya, et al. v. Islamic Republic of Iran, 1:18-cv-12341(GBD) (SN)))

NOTICE OF MOTION

PLEASE TAKE NOTICE that, by and through their undersigned counsel and upon the accompanying Memorandum of Law, Plaintiffs in the above-captioned *Marie Laure Anaya*, et al. v. Islamic Republic of Iran, 1:18-cv-12341 (GBD) (SN) respectfully move this Court pursuant to Federal Rules of Civil Procedure 15 for an order correcting errors in their First Amended Short Form Complaint filed on February 22, 2019 (ECF No. 29), and for such other and further relief as the Court deems just and proper.

Dated: June 23, 2021

White Plains, New York

FLEISCHMAN BONNER & ROCCO LLP

By: /s/ James P. Bonner
James P. Bonner (jbonner@fbrllp.com)
Patrick L. Rocco (procco@fbrllp.com)
Susan M. Davies (sdavies@fbrllp.com)
81 Main Street, Suite 515
White Plains, New York 10601
Telephone: 908-516-2066

Joseph Peter Drennan (admitted *pro hac vice*) 218 North Lee Street, Third Floor Alexandria, Virginia 22314-2631 Telephone: (703) 519-3773 Telecopier: (703) 997-2591

Mobile: (540) 226-0777

joseph@josephpeterdrennan.com

Patrick M. Donahue (admitted pro hac vice)
P. Joseph Donahue (admitted pro hac vice)
Thomas P. Donahue (admitted pro hac vice)
THE DONAHUE LAW FIRM, LLC
18 West Street
Annapolis, MD 21401
Telephone: (410) 280-2023
pmd@thedonahuelawfirm.com
pjd@thedonahuelawfirm.com
tpd@thedonahuelawfirm.com

P. York McLane (admitted *pro hac vice*) LAW OFFICE OF P. YORK MCLANE 14015 Park Dr., Ste. 111 Tomball, Texas 77377 yorkmclane@yahoo.com

Counsel for Plaintiffs